

ORIGINAL

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Attorney for Defendant
SANFORD JACOBSON

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

APR 06 2006

at 1 o'clock and 4 min. M
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 05-00367-04 DAE
)	
Plaintiff,)	[18 U.S.C. 1956(a)(1)(B)(i),
)	(a)(3), (h) and 2]
vs.)	
)	NOTICE OF DEFENDANT SANDFORD
SANDFORD JACOBSON, (04),)	JACOBSON'S MOTION TO CONTINUE
et al.,)	PRETRIAL CONFERENCE HEARING AND
)	TRIAL; DEFENDANT SANDFORD
Defendants.)	JACOBSON'S MOTION TO CONTINUE
)	PRETRIAL CONFERENCE HEARING AND
)	TRIAL; DECLARATION OF COUNSEL;
)	CERTIFICATE OF SERVICE
)	
)	Approximate Time: 5 minutes
)	Date of Hearing: _____
)	Time of Hearing: _____
)	Judge: _____
)	

NOTICE OF DEFENDANT SANDFORD JACOBSON'S MOTION TO CONTINUE
PRETRIAL CONFERENCE HEARING AND TRIAL

TO: THOMAS MUEHLECK, ESQ.
Assistant United States Attorney
Room 6100, PJKK Federal Bldg.
300 Ala Moana Blvd., Box 50183
Honolulu, Hawaii 96850

[CERTIFICATE OF SERVICE ATTACHED]

Attorney for Plaintiff
United States of America

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Attorney for Defendant
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RICHARD D. GRONNA
820 Mililani Street, Ste. 812
Honolulu, Hawaii 96813
Attorney at Law
Robert Cruz

PLEASE TAKE NOTICE that the foregoing motion will be heard
before the Honorable _____, United States
District Judge and/or Judge Magistrate, in the courtroom of the
said Judge in the United States Courthouse, 300 Ala Moana
Blvd., Honolulu, Hawaii, on _____,
_____, 2006 at _____ O'clock
_____.M., or as soon thereafter as counsel may be heard.

DATED: Honolulu, Hawaii, April 6, 2006.



LOUIS MICHAEL CHING 4209
Attorney for Defendant
SANFORD JACOBSON

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 05-00367-04 DAE
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Plaintiff,)	[18 U.S.C. 1956(a)(1)(B)(i),
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vs.)	
)	
SANDFORD JACOBSON, (04),)	
et al.,)	DEFENDANT SANDFORD JACOBSON'S
)	MOTION TO CONTINUE PRETRIAL
Defendants.)	CONFERENCE HEARING AND TRIAL
)	
)	

DEFENDANT SANDFORD JACOBSON'S MOTION TO CONTINUE PRETRIAL
CONFERENCE HEARING AND TRIAL

COMES NOW Defendant SANFORD JACOBSON, by and through his counsel, Louis Michael Ching and respectfully moves this Honorable Court for an order granting continuance of the pretrial conference hearing and trial, to wit, a new date agreed upon by the parties.

This Motion to continue is based upon the following findings by the court that:

1. The instant case is complex and it would be unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by 18 U.S.C. 3161;

2. Further, taken as a whole, and based upon Declaration of Counsel, failure to grant a continuance, would deny

defendant the reasonable time necessary for effective preparation, even taking into account the exercise of due diligence;

This motion is made pursuant to Rules 12 and 47 of the Federal Rules of Criminal Procedure, 18 U.S.C. 3161, the United States Constitution, Declaration of Counsel, the records and files herein, and any and all evidence adduced at the hearing on this motion.

DATED: Honolulu, Hawaii, April 6, 2006.

A handwritten signature in dark ink, appearing to read "L. M. Ching", is written above a horizontal line.

LOUIS MICHAEL CHING 4209
Attorney for Defendant
SANFORD JACOBSON